

Message

From: Woods, Clint [woods.clint@epa.gov]
Sent: 9/6/2018 1:38:04 PM
To: Theresa Pugh [Pugh@theresapughconsulting.com]; Swanson, Nicholas [Swanson.Nicholas@epa.gov]
CC: Hambrick, Amy [Hambrick.Amy@epa.gov]
Subject: RE: Request for appointment: September 17 or 18 (or 19) EPA-HQ-OAR-2017-0355

Theresa,

Thanks again for talking this morning, and my apologies for the delay in following up. As I mentioned, I should be in RTP on the 18th and, if Amy and Nick don't mind, would welcome the chance to swing by for your discussion that morning.

Clint Woods
Deputy Assistant Administrator
Office of Air and Radiation, U.S. EPA
202.564.6562

From: Theresa Pugh [mailto:Pugh@theresapughconsulting.com]
Sent: Thursday, August 23, 2018 5:53 PM
To: Woods, Clint <woods.clint@epa.gov>; Swanson, Nicholas <Swanson.Nicholas@epa.gov>
Cc: Hambrick, Amy <Hambrick.Amy@epa.gov>
Subject: Request for appointment: September 17 or 18 (or 19) EPA-HQ-OAR-2017-0355

Dear Clint (and Nick),

It dawned on me that you would probably be at the AAPCA meeting in Sept or perhaps be in RTP that week. Please see the note below requesting an appointment. It is my hope to meet with you, Amy and Nick's groups together. Please scroll down.

I would make time to meet with all of you but hope your schedules make you available on Sept 17 after 2 or on Sept 18. I could make it Sept 19 if that is the only available time.

My note to Nick and Amy is below. I accidentally mis-keyed Nick's email below.

Thank you,

Theresa Pugh
Owner
Theresa Pugh Consulting, LLC
pugh@theresapughconsulting.com
703-507-6843

From: <Pugh@theresapughconsulting.com>
Date: August 23, 2018 at 4:53:43 PM EDT
To: Amy Hambrick <hambrick.amy@epa.gov>, <nick.swanson@epa.gov>
Subject: Request for appointment: September 17 or 18

Dear Amy and Nick

Good afternoon. I will be in RTP in Sept for the AAPCA meeting and wondered if there is an opportunity to meet with your staff regarding natural gas issues that are relevant for NSPS 111(d) (new ACE proposed rule) and the EPA's next steps on section OOOOa on methane for new (or existing) pipelines and compressor stations serving power sector and LDCs.

My clients are electric utilities and I have expertise with pipelines/compressor stations. I am active with NERC (unpaid advisor).

If possible, I would like to come in and see your staff (both 111d team and OOOOa) in the next month on some issues relevant to the "remaining useful life of the plant" and NERC's Nov 2017 study. I served on a NERC study in the last year as an unpaid advisor on natural gas issues. There are 23 areas in the US where more than one gas-fired power plants are served by only one pipeline with no redundancy in transmission pipelines or the underground gas storage. That places some risk for force majeure for power plants.

NERC recommends that EPA and state agencies allow for a dual fuel approval in Title V permits when voltage support or force majeure events occur- even if during ozone season. This shouldn't mean a carte blanche to run oil units or create significant new ozone problems without justification. But NERC does find 23 area (some geographically small) with electricity reliability problems - at least until more gas storage and pipelines are built. This issue is both relevant to ACE and 111(d)). It is also important that those oil- fired or alternative fuel fired units meet all other relevant regulations including SPCC (RCRA). Many dual fuel plants in the US outside of New England have not maintained the tanks or lack sufficient footprint space to have more than 1-2 days of oil onsite.

I will be at AAPCA meeting and will request to talk to Amy and Nick's group(s)- preferably together since the issues meet for gas generators.

The link to the NERC study is

https://www.nerc.com/pa/RAPA/ra/Reliability%20Assessments%20DL/NERC_SPOD_11142017_Final.pdf

I look forward to seeing you- either in RTP on Sept 17-18 or via camera phone at a call in headquarters. I can easily go down to headquarters for a combination meeting. (I reached out to Wehrum earlier today asking if he could join in).

I am available on Sept. 17 at 3-5 (following a drive down from DC) or on Sept 18

Thank you,

Theresa Pugh
Owner
Theresa Pugh Consulting, LLC
pugh@theresapughconsulting.com
703-507-6843
www.theresapughconsulting.com

~ a woman owned small business~

Sent from mobile device, please excuse typos.